

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

v.

FORTINET, INC.

Defendant.

Civil Action No. 2:22-CV-00322-JRG-RSP

(LEAD CASE)

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

v.

CISCO SYSTEMS, INC.

(MEMBER CASE)

Defendant.

Civil Action No. 2:22-CV-00305-JRG-RSP

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

v.

PALO ALTO NETWORKS, INC.

(MEMBER CASE)

Defendant.

Civil Action No. 2:22-CV-00334-JRG-RSP

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Lionra Technologies Limited and Defendant Cisco Systems, Inc. (the “Parties”) jointly notify the Court that all matters in controversy between the Parties have been settled, in principle. Accordingly, the Parties jointly move the Court to stay all unreached deadlines contained in the Court’s Docket Control Order for thirty (30) days so that the appropriate dismissal papers may be submitted.

For purposes of clarity, this Joint Motion to Stay applies only to *Lionra Technologies Limited v. Cisco Systems, Inc.*, Case No. 2:22-cv-305-JRG-RSP. All deadlines in *Lionra Technologies Limited v. Palo Alto Networks, Inc.*, Case No. 2:22-cv-334-JRG-RSP remain unaffected.

Dated: May 10, 2024

Respectfully submitted,

/s/ Brett E. Cooper by permission Andrea L. Fair

Brett E. Cooper (NY SBN 4011011)
bcooper@bc-lawgroup.com
Seth Hasenour (TX SBN 24059910)
shasenour@bc-lawgroup.com
Jonathan Yim (TX SBN 24066317)
Drew B. Hollander (NY SBN 5378096)
BC LAW GROUP, P.C.
200 Madison Avenue, 24th Floor
New York, New York 10016
Telephone: (212) 951-0100
Facsimile: (646) 293-2201

Andrea L. Fair (TX Bar No. 24078488)
Garrett Parish (TX Bar No. 24125824)
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, Texas 75604
Telephone: (903) 757-6400
Email: andrea@wsfirm.com
Email: gparish@wsfirm.com

Glen E. Summers (CO Bar No. 30635)
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, Colorado 80202
Telephone: (303) 592-3100
Email: glen.summers@bartlitbeck.com

Mark Levine (IL Bar No. 6276086)
Luke Beasley (IL Bar No. 6334359)

BARTLIT BECK LLP
54 West Hubbard Street, Suite 300
Chicago, Illinois 60654
Telephone: (312) 494-4400
Email: mark.levine@bartlitbeck.com
Email: luke.beasley@bartlitbeck.com

Amy J. Wildermuth (IL Bar No. 6256999)
17811 Comstock Road
Wayzata, Minnesota 55391
Telephone: (801) 913-4068
Email: amy.wildermuth@gmail.com

*Attorneys for Plaintiff
Lionra Technologies Limited*

/s/ Brian A. Rosenthal by permission Andrea L. Fair
Melissa R. Smith
Texas Bar No. 24001351
GILLAM & SMITH LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450
Facsimile: (903) 934-9257
Email: melissa@gillamsmithlaw.com

Brian A. Rosenthal (Lead Attorney)
brosenthal@gibsondunn.com
Katherine Dominguez
kdominguez@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
Telephone: (212) 351-6300
Facsimile: (212) 351-4035

Stuart M. Rosenburg
srosenberg@gibsondunn.com
1881 Page Mill Road
Palo Alto, California 94304-1211
Telephone: (650) 849-5300
Facsimile: (650) 849-5333

Albert Suarez IV
asuarez@gibsondunn.com

Texas Bar No. 24113094
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, Texas 75201-6912
Telephone: (214) 698-3360
Facsimile: (214) 571-2907

Attorneys for Defendant Cisco Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2024, the foregoing was electronically filed in compliance with Local Rule CV-5(a) and served via the Court's CM/ECF system on all counsel of record who have consented to electronic service.

/s/ Andrea L. Fair
Andrea L. Fair

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), the undersigned certifies that counsel for Plaintiff Lionra Technologies Limited met and conferred with counsel for Defendant Cisco Systems, Inc. on May 10, 2024. The Parties are in agreement and seeking joint relief.

/s/ Andrea L. Fair
Andrea L. Fair